

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
NEW BERN DIVISION

IN RE:)
)
WILLIAM EARL FONVILLE,) Case No. 11-00743-8-RDD
DORIS VG. FONVILLE,)
) Chapter 13
SSN: XXX-XX-0146)
SSN: XXX-XX-1282)
)
Debtors)

REPLY TO TRUSTEE'S MOTION TO DISMISS

NOW COMES the Debtor(s) herein by and through his/her/their undersigned counsel of record, and hereby responds to the Trustee's Motion to Dismiss and shows unto the Court as follows:

1. Debtors filed a Chapter 13 on February 1, 2011.
2. The Debtors are aware that they are delinquent with their Chapter 13 Plan payments and intend to cure all arrearages.
3. Debtors' attorney requests that he be awarded the presumptive non base attorney fee of \$250.00 for preparing said response and defending the Trustee's Motion to Dismiss.

WHEREFORE, Debtors pray that this Court enter an Order Denying Trustee's Motion to Dismiss and award counsel for the Debtors' attorney's fees in the amount of \$250.00.

This 23rd day of November, 2015.

/s/ **Robert Lewis, Jr. (NC Bar No. 35806)**
The Lewis Law Firm, P.A.
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CERTIFICATE OF SERVICE

I Robert Lewis, Jr. do hereby certify, under penalty of perjury, that I am sufficient age to tender service; and that on this day I had served the attached Response to Trustee's Motion to Dismiss by regular U.S. mail or by Electronic Case Filing System, upon the parties set forth below:

Richard Stearns (sent via electronic filing)
Chapter Trustee

Bankruptcy Administrator (sent via electronic filing)

Mr. William Earl Fonville
Mrs. Doris G. Fonville
c/o Thomasine Dudley
P.O. Box 32
Ernul, NC 28527

This 23rd day of November, 2015.

/s/ Robert Lewis, Jr. (NC Bar No. 35806)
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